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6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 STEVE MOSHTAGH, an individual on
10 behalf of himself and other similarly
11 situated,

12 Plaintiff,

13 v.

14 THE HOME DEPOT U.S.A., Inc., a

15 Delaware corporation,

16 Defendant.

CASE NO. 2:19-cv-01205 RSM

**STIPULATION AND
ORDER REGARDING
ATTORNEYS' EYES
ONLY PROTECTIVE
ORDER**

17 Discovery in this action involves production of "Confidential" material as that term is
18 described in Paragraph 2 of the Stipulated Protective Order entered by the Court on November 21,
19 2019. Dkt. #23. Certain Confidential material sought in discovery includes highly sensitive
20 business information of Home Depot U.S.A., Inc. which, if disclosed to members of the public, to
21 plaintiff, to putative class members, or other current or former employees of defendant, may
22 jeopardize the safety and security of Home Depot employees, customers, and property.
23 Accordingly, the parties hereby stipulate and petition the Court to enter the following
24 STIPULATION REGARDING ATTORNEYS' EYES ONLY PROTECTIVE ORDER:
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1 1. All documents and other materials produced by Home Depot in response to
2 plaintiff's Request for Production Nos. 43 and 44 shall be considered "Attorneys' Eyes Only"
3 material. Such material shall be marked by the producing party as "Attorneys' Eyes Only."

4 2. Use and disclosure of "Attorneys Eyes Only" material shall be restricted solely to
5 counsel for the parties, including in-house counsel, and employees of counsel for the parties to
6 whom disclosure is strictly necessary for this litigation, unless additional persons are stipulated by
7 counsel for the parties or authorized by Court order. However, the parties agree that prior to being
8 shown any documents or materials marked "Attorneys' Eyes Only," any person other those
9 expressly identified in this paragraph 2, shall be informed of the terms of this stipulation and the
10 Protective Order, and sign the "Acknowledgment and Agreement to Be Bound" attached as Exhibit
11 A to the Protective Order.

12 3. All documents and material designated as "Attorneys Eyes Only" shall be subject
13 to the terms of the Protective Order, including, but not limited to, the filing restrictions set forth in
14 Section 4.3 of the Protective Order.

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16 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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18 DATED: February 25, 2020

/s/ Peter D. Stutheit

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DATED: February 25, 2020

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DATED: February 25, 2020

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PURSUANT TO STIPULATION, IT IS SO ORDERED this 26th day of February 2020.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE